

FW: Activity in Case 1:22-cv-00510 v. Reynaud et al Complaint

REYNAUD Ludivine Joan Claudia <ludivine.reynaud@europarl.europa.eu>

Thu 3/31/2022 2:10 PM

To: Molnar, Dan <Molnar@cityofmentor.com>

 2 attachments (157 KB)

RE: Activity in Case 1:22-cv-00510 v. Reynaud et al Complaint; LJCR Litigation Hold (003).pdf;

Dear Sir,

Here is a copy of the lawsuit I was sent by Bryan Reo.

Sincerely,

Ludivine REYNAUD

RE: Activity in Case 1:22-cv-00510 v. Reynaud et al Complaint

REYNAUD Ludivine Joan Claudia <ludivine.reynaud@europarl.europa.eu>

Thu 3/31/2022 1:30 PM

To: 'Bryan Reo' <reo@reolaw.org>

Cc: Molnar, Dan <Molnar@cityofmentor.com>

Hello Bryan

I received your lawsuit.

With respect to the porn sites, I cannot prove your involvement in this given that sites do not give IP address for legal reasons. Results appeared on cached Google search results but I can't tell who was involved. I wrote as much to Mr Shaw, who is a police officer in Mentor Ohio. If you say that was not you, then that is perfect.

As I did in August, in writing, I ask you to stop all contact with me, and not to sue my boss or people from my organization who you have never met, talked to, or written to in your life, and to stop interfering in my professional and personal life.

Sincerely,
Ludivine REYNAUD

From: Bryan Reo <reo@reolaw.org>

Sent: 31 March 2022 18:24

To: REYNAUD Ludivine Joan Claudia <ludivine.reynaud@europarl.europa.eu>

Subject: Fwd: Activity in Case 1:22-cv-00510 v. Reynaud et al Complaint

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Bryan Anthony Reo (#0097470)

REO LAW LLC

P.O. Box 5100

Mentor, Ohio 44061

(Business): (216) 505-0811

(Personal): (440) 313-5893

Admissions- Ohio Courts and Agencies [#0097470], Michigan Courts and Agencies [#P84119], N.D. Ohio, S.D. Ohio, E.D. Michigan, W.D. Michigan, United States Court of Appeals for the 3rd Circuit, United States Court of Appeals for the 6th Circuit, and the United States Court of Appeals for the Armed Forces (#37033)

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From: ohndecf@ohnd.uscourts.gov

Date: March 31, 2022 11:55:35 AM

Subject: Activity in Case 1:22-cv-00510 v. Reynaud et al Complaint

To: OHNDdb_CleECF@ohnd.uscourts.gov

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U.S. District Court

Northern District of Ohio

Notice of Electronic Filing

The following transaction was entered by Reo, Bryan on 3/31/2022 at 11:54 AM EDT and filed on 3/31/2022

Case Name: v. Reynaud et al

Case Number: 1:22-cv-00510

Filer: Bryan Anthony Reo

Document Number: 1

Docket Text:

Complaint with jury demand against Dominique Bilde, Ludivine Joan Claudia Reynaud. Filing fee paid \$ 402, Receipt number AOHNDC-11350219.. Filed by Bryan Anthony Reo. (Attachments: # (1) Civil Cover Sheet, # (2) Summons) (Reo, Bryan)

1:22-cv-00510 Notice has been electronically mailed to:

Bryan A. Reo reo@reolaw.org

1:22-cv-00510 Notice has been delivered by other means to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP OHNDStamp_ID=875560366 [Date=3/31/2022] [FileNumber=10369214-0]
[22664d4854f98dc13bcdefb69787f758ea3f425f97e9705f77c6eae9d174e9dd1295
2ebc7c9dc77c3721820632821df314112938439f19dc16a9ea3d313304a1]]

Document description:Civil Cover Sheet

Original filename:n/a

Electronic document Stamp:

[STAMP OHNDStamp_ID=875560366 [Date=3/31/2022] [FileNumber=10369214-1]]

[a85177e80bbe9016c9702f8ae9d185c03b6c4ddffc38c42358ac0ac7485bbbb24748
802fc69f1063f0690883af3c11c7ed2f276db4c28149edae0058e6a797c3]]

Document description:Summons

Original filename:n/a

Electronic document Stamp:

[STAMP OHNDStamp_ID=875560366 [Date=3/31/2022] [FileNumber=10369214-2]

[5464694fa20dcf55e3476f026de7dc3b90d1767c62e52f3b8d1ede602b75f42ab811

b5410f7dad357dde15da690c4f965790490ec238a72e796c7db197525f83]]

REO LAW LLC

March 31, 2022

Bryan A. Reo, Esq.

Admissions:

- **Ohio ((#0097470))**
- **Michigan ((#P84119))**
- **N.D. Ohio**
- **S.D. Ohio**
- **E.D. Michigan**
- **W.D. Michigan**
- **3rd Circuit**
- **6th Circuit**
- **AFCCA**
- **NMCCA**
- **USCAAF ((#37033))**

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Reo@ReoLaw.org

CIVIL LITIGATION

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APPEALS [CRIMINAL
AND CIVIL]

EXTRAORDINARY
WRITS

COMMERCIAL REAL
ESTATE

AGRICULTURAL
REAL ESTATE

FIRST AMENDMENT

To-

Ludivine Joan Claudia Reynaud

Dominique Bilde

Marine Le Pen

Sent via email to-

Ludivine.reynaud@europarl.europa.eu

ludivine.reynaud@sciencespo.fr

joan.reynaud89@gmail.com

dominique.bilde@europarl.europa.eu

marine.lepen@assemblee-nationale.fr

Sent via Fedex International Express to-

Marine Le Pen

Assemblée nationale,

126 Rue de l'Université,

75355 Paris 07 SP

Marine Le Pen

99 Place Jean Jaurès

62110 Hénin-Beaumont

Dominique Bilde [restricted delivery, direct signature required because
Ludivine Reynaud has stated she deletes emails and discards envelopes she
does want Dominique Bilde to see.]

Parlement européen

Bât. ALTIERO SPINELLI

04F368

60, rue Wiertz / Wiertzstraat 60

B-1047 Bruxelles/Brussel

Ludivine Joan Claudia Reynaud

Parlement européen

Bât. ALTIERO SPINELLI

04F368

60, rue Wiertz / Wiertzstraat 60

B-1047 Bruxelles/Brussel

Re- Notice of Order for Preservation of Electronically Stored Evidence
Because of Filed Civil Lawsuit. [Case #- 22:cv-00510] Bryan Anthony Reo v.
Ludivine Joan Claudia Reynaud et. al. United States District Court for the
Northern District of Ohio]

Please find attached a stamped complaint that has been filed in United States District Court for the Northern District of Ohio. This does not constitute formal service per Hague Convention, but rather informal service. Plaintiff Reo is willing to discuss the possibility of settlement terms with Ms. Reynaud so that this lawsuit can be expeditiously settled and resolved before it is served and before the process begins with formal deadlines.

This letter concerns preservation of evidence in regards to claims Mr. Bryan Anthony Reo (also an Ohio attorney) is pursuing in a filed civil lawsuit against Ludivine Joan Claudia Reynaud and Dominique Bilde.

This letter is to serve as notice that you are instructed to preserve, not modify, refrain from deleting, and maintain in their current state, emails, texts, and any other electronically stored information regarding Ludivine Joan Claudia Reynaud, communications from her, and especially emails and logs of employee usage of work computers and internet activities during work hours (whether remotely or on-site).

On Tuesday 10 May 2021 Ludivine Joan Claudia Reynaud sent 119 emails, from account ludivine.reynaud@sciencespo.fr during a period of 12 hours from 08:00 to 18:00 when she was clearly at work, on a work schedule, and using work resources. These emails were sent to Reo@ReoLaw.org and many of the emails were vulgar, lewd, menacing, harassing, and derogatory, and even threatening. Some of the emails made references to Mr. Reo's genitals, speculated as to his sexuality, and encouraged him to consort with prostitutes or engage in self-harm. During the night of 10 May 2021 and early morning of 11 May 2021, Ludivine Reynaud incessantly telephoned Mr. Reo during hours when a reasonable person would assume a man in the United States in Eastern Standard Time would be asleep, 01:00 to 06:00 hours local USA time.

Civil Causes of Action have arisen against Ludivine Joan Claudia Reynaud for defamation, invasion of privacy false light, and abuse of process. Claims against Dominique Bilde exist for negligent hiring, negligent supervision, and vicarious liability for failure to properly supervise a worker. If Ms. Reynaud was able to spend literally the entire working day of 10 May 2021 sending harassing emails unrelated to her job, via a personal email account from a work computer in her office, then it naturally follows that Ms. Bilde is not meaningfully supervising or monitoring Ms. Reynaud in any appreciable context. On 10 May 2021 Ms. Reynaud sent Mr. Reo one harassing email every 6 minutes for almost 12 hours without interruption. That was how Ms. Reynaud spent her entire work day on 10 May 2021.

Mr. Reo also reports that Ms. Reynaud frequently called him during week-days/work-days at times that were clearly office times, often to threaten him, threaten him with involvement in litigation, threatening a "Trans-Atlantic litigation war," threatening to cause him problems in his career, threatening to go to the USA to commit suicide on the premises of his property, threatening to throw herself off of a height/roof, threatening to undergo medical euthanasia in Belgium, threatening to overdose on medication, and making generally dramatic and disturbing statements. Ms. Reynaud spent approximately 4 hours calling Mr. Reo on 15 May 2020 during the local working day in Belgium, she broke down in tears, cried, and threatened to commit suicide by either throwing herself off of a fire escape or overdosing on pills, because she was upset that she had a tax problem and she was "about to turn 31" and she insisted "it is all down

hill from here.” she inquired of Mr. Reo if he believed a fall from a floor level 4 or floor level 5 would be fatal. Based on Ms. Reynaud’s own admissions, she “accidentally” overdosed on medication on or about 9 August 2021 and was hospitalized in what was likely a suicide attempt.

Ms. Reynaud’s unstable behavior has now extended to making false and misleading police reports to authorities in Belgium and the USA against Mr. Reo. It appears Ms. Reynaud is using work time and work computer/internet resources in the EU Parliament to make these reports.

On 15 March 2022 Mr. Reo was advised by municipal police in his city that a “crazy woman claiming that she works with the EU Parliament and is your ex-girlfriend in Belgium contacted us and told us you were bothering her and she wanted us to shut you down.” Ms. Reynaud has now taken to expanding her campaign against Mr. Reo by using third parties (police) to cause problems for Mr. Reo because Ms. Reynaud is livid that Mr. Reo ended a relationship with Ms. Reynaud in preference for reconciling with an ex-wife, and essentially picked another woman over Ms. Reynaud, with the connection of Mr. Reo and Ms. Reynaud absolutely ending in August 2021. Mr. Reo was told by American police their impression was that Ms. Reynaud was unstable, imbalanced, problematic, and that they were taking down her report as required by procedure and then closing the file without further action because Mr. Reo had broken no laws, violated no telecommunications regulations, and as the inspector stated, “even if Mr. Reo were in contact with her, no law has been broken, he is allowed to contact her.” The police even told Mr. Reo that he was free to continue contacting Ms. Reynaud if he wished to but that they recommended, “given how unstable she seems to be, it might be best to just wash your hands of her and not try to contact her again.”

On 29 March 2022, Mr. Reo’s local municipal police provided him with all relevant records in regards to the exact and complete email correspondence they had with Ludivine Reynaud including the initial complaints Ms. Reynaud made against Mr. Reo. Ms. Reynaud used her Ludivine.reynaud@europarl.europa.eu email account on 3 March 2022, made the emails during work-days and during work hours, and mentioned her status as an assistant to an MEP to lend credibility to her accusations. Ms. Reynaud openly accused Mr. Reo of disseminating pornographic content about her and of posting pornographic content online under her name, completely baseless accusations and accusations for which she tellingly provided absolutely no supporting evidence to police. Ms. Reynaud formally accused Mr. Reo of a sex crime under Ohio law and then provided no evidence to substantiate her accusation. The accusation was formally made, she requested charges be pursued, and she did not withdraw the allegation. Municipal police in Ohio have sided with Mr. Reo and closed the investigation/file. Because Ms. Reynaud violated Ohio law, committed civil torts, and violated Belgian Criminal Code Section 445 (calumnious denunciation/defamation), Mr. Reo has been damaged in Ohio and Belgium.

A review of this site reveals that on 31 March 2022 Ms. Reynaud spent more than one hour of the working day on the website Quora deleting answers/content she had previously posted on the website. Doubtlessly trying to clean up her controversial past. <https://www.quora.com/profile/Ludivine-Reynaud/log> This again raises concerns that Ms. Bilde does not meaningfully supervise Ms. Reynaud in any capacity. Ms. Reynaud is either a rogue employee who needs to be held to account for the fact she spends her work days doing anything and everything except actual work, or Ms. Reynaud operates this way with the full knowledge and approval of Ms. Bilde, in which case Ms. Bilde is absolutely responsible for what Ms. Reynaud does during work hours. I am not versed on French employment law or work culture

but no American office worker would be allowed to spend entire work days engaged in these personal pursuits while using work resources to cause these sorts of problems.

Phones, devices, and computers are to be preserved as Mr. Reo will seek to have hard-drives examined and imaged because Ms. Reynaud used a work computer and work internet resources on 10 May 2021 and at other times. Ms. Reynaud is a walking disaster and a herald of endless drama and contention. Her continued access to EU Parliamentary computer resources that she is able to utilize and the enhanced credibility she receives by invoking the name of the EU Parliament when she makes ridiculous complaints to police, is unacceptable.

Mr. Reo will serve subpoenas compelling Ms. Reynaud, Ms. Bilde, and Ms. Len Pen to produce electronic devices, phones, and hard-drives for imaging if such is necessary to obtain the relevant records. Note that American courts routinely compel the production of such devices by defendants in litigation involving these sorts of claims.

Marine Le Pen and Dominique Bilde are therefore instructed to maintain and preserve all records relevant to or related to the hiring of Ms. Reynaud, Reynaud's employment related referral to psychiatric counselling which occurred in 2016-2017, any employee reviews or evaluations, documents relating to the circumstances whereby she left her job with the Mayor(s) of Le Luc in Provence in 2014-2016, and any documents relating to any other MEPs she previously worked for and the circumstances under which that employment came to an end.

The purpose of the litigation initiated in the United States District Court for the Northern District of Ohio against Dominique Bilde and Ludivine Joan Claudia Reynaud is to assure that Ms. Reynaud is no longer engaging in tortious conduct against Mr. Reo and that Mr. Reo is fully compensated for the damage his reputation has suffered because of Ms. Reynaud's attempting to poison the well in the Lake County Ohio legal community by making baseless complaints of sex crimes to law enforcement and lawyers alongside whom Mr. Reo regularly works. Mr. Reo works in a small legal community and is well-known and respected by local law enforcement, judges, prosecutors, and other colleagues in the legal profession. Ms. Reynaud has undertaken to poison the well of a small close-knit professional community against Mr. Reo.

For his part Mr. Reo is an accomplished civil litigator and an expert in defamation law and is perhaps one of the most preeminent and successful defamation lawyers in Ohio. Mr. Reo has won 100% of his defamation cases with 7 wins out of 7 cases in the last 3 years, winning 6 for the plaintiff's side and 1 for the defense side. On the Plaintiff's side Mr. Reo obtained judgments in the amounts of \$1,000,000.00 dollars, \$750,000.00 dollars, \$500,000.00 dollars, \$500,000.00 dollars, \$60,000.00 dollars, and \$45,000.00 dollars. If it becomes necessary to litigate these claims to a conclusion, please realize your potential civil exposure will be extreme. Mr. Reo has successfully prevailed against abusive call centers, shut down fraudulent telemarketing operations, triumphed over organized crime syndicates involved in illicit money-lending, and successfully destroyed a neo-Nazi and KKK organization.

As to the last part, Mr. Reo is concerned that Ms. Reynaud, given her affiliations with notorious neo-Nazi and Holocaust denial website host Emmanuel Brun d'Aubignosc (whom she tried to help procure employment at the EU Parliament as an MEP Assistant) has a personal vendetta against Mr. Reo because of Mr. Reo's dedication to litigation that shut down notorious holocaust deniers and neo-Nazis in the USA. Ms. Reynaud's affiliation with one of Europe's most prolific

Holocaust denial website hosts is truly despicable, especially in light of her employment in the EU Parliament. Mr. Reo previously litigated against a neo-Nazi activist who is the grandson of a Senator, prevailed against the man, placed a lien on the man's farm/ranch, foreclosed, and took the land. If Mr. Reo obtains a judgment against Ms. Bilde, the judgment will be collected upon.

Ms. Reynaud may claim she did not know that Emmanuel Brun d'Aubignosc was a Holocaust denier website hoster and Nazi organizer when she tried to help him in 2016-2018, however the first result on google for googling his name is an article from 2007 that shows him with David Duke and Nick Griffin and explains he is a Holocaust denier. How could Ms. Reynaud not know? Why would she try to help a man get a job if she knew nothing about him and had never even google searched his name? <https://www.splcenter.org/fighting-hate/intelligence-report/2007/belgian-webmaster-hosts-us-european-hate-sites>

Would any reasonable person try to help another obtain a sensitive job without even searching their name? Of course Ms. Reynaud has always known Emmanuel is a Holocaust denier and Nazi organizer. Now she appears to possibly be on a vendetta against Mr. Reo because Mr. Reo shut down some of the most notorious criminal Nazis and Holocaust deniers in the USA.

Please respond and acknowledge receipt of this correspondence and detail the steps you are taking to preserve evidence and to limit Ms. Reynaud's ability to continue utilizing your resources to engage in tortious conduct against Mr. Reo in Ohio.

If you do not provide acknowledgement of receipt of this correspondence and detail what steps you have undertaken and are willing to undertake to resolve the claims and you instead wish to stand by the conduct of Ms. Reynaud, please note that service of the attached Complaint will be effectuated in accordance with the Hague Convention rules for international service of process and the litigation will properly proceed. Note the Complaint has already been filed with the United States District Court for the Northern District of Ohio.

REO LAW, LLC

/s/ BRYAN ANTHONY REO
Bryan Anthony Reo (#0097470)
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